

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

THE GENERAL HOSPITAL
CORPORATION and
DANA-FARBER CANCER
INSTITUTE, INC.,

Plaintiffs,

v.

ESOTERIX GENETIC
LABORATORIES, LLC and
LABORATORY CORPORATION
OF AMERICA HOLDINGS,

Defendants.

C.A. No. 1:18-cv-11360-IT

JOINT MOTION TO AMEND CASE SCHEDULE

The parties, the plaintiffs The General Hospital Corporation and Dana-Farber Cancer Institute, Inc. and the defendants Esoterix Genetic Laboratories, LLC and Laboratory Corporation of America Holdings (a/k/a Laboratory Corporation of America), hereby jointly move to amend the remaining items on the Court's current case schedule [*see* Dkt. 137] as set forth below.

Task	Current Deadline	Amended Deadline
Service of any subsequent requests for production and interrogatories	March 6, 2020	April 3, 2020
Service of any requests for admission	April 3, 2020	May 1, 2020
Completion of fact depositions	May 8, 2020	June 30, 2020
Completion of fact discovery	May 8, 2020	June 30, 2020
Filing of dispositive motions	June 5, 2020	July 31, 2020

In support of their joint motion, and by way of a status update, the Parties state that they have made significant progress on email discovery and the discovery of other electronically stored information. They finalized and ran search terms against an agreed list of custodians and are in the process of reviewing many thousands of individual records resulting from those searches for privilege issues and relevance prior to production. The parties require the requested additional time to: (a) allow sufficient time to complete their review of their own records prior to production; and (b) allow for sufficient time to take depositions after it is expected that the current COVID-19 crisis and its restrictions on travel and in-person gatherings may let up. The parties are hopeful that this is the last amendment to the schedule they will need to request but note that it largely depends on when the current crisis lets up sufficiently so they can take depositions.

WHEREFORE, the parties respectfully request that this Court grant their Joint Motion to Amend Case Schedule.

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Respectfully submitted,

Plaintiffs,
THE GENERAL HOSPITAL
CORPORATION and
DANA-FARBER CANCER
INSTITUTE, INC.
By their attorneys,

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Defendants,
ESOTERIX GENETIC LABORATORIES,
LLC and LABORATORY CORPORATION
OF AMERICA HOLDINGS,

By their attorneys,

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Dated: March 19, 2020

CERTIFICATE OF SERVICE

I, Douglas J. Nash, certify that on March 19, 2020, this Joint Motion filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to the non-registered participants.

/s/ Douglas J. Nash
Douglas J. Nash